

ROBINS KAPLAN LLP
ATTORNEYS AT LAW
MINNEAPOLIS

1 ROBINS KAPLAN LLP
 2 Roman M. Silberfeld, Bar No. 62783
 3 RMSilberfeld@rkmc.com
 4 David Martinez, Bar No. 193183
 5 DMartinez@rkmc.com
 6 Laura E. Nelson, Bar No. 231856
 7 LENelson@rkmc.com
 8 Jill S. Casselman, Bar No. 266085
 9 JSCasselman@rkmc.com
 10 2049 Century Park East, Suite 3400
 11 Los Angeles, CA 90067-3208
 12 Telephone: 310-552-0130
 13 Facsimile: 310-229-5800

14 Attorneys for Plaintiffs
 15 BEST BUY CO., INC.; BEST BUY PURCHASING
 16 LLC; BEST BUY ENTERPRISE SERVICES, INC.;
 17 BEST BUY STORES, L.P.; BESTBUY.COM,
 18 L.L.C.

19 **UNITED STATES DISTRICT COURT**
 20 **NORTHERN DISTRICT OF CALIFORNIA**
 21 **SAN FRANCISCO DIVISION**

22 IN RE: CATHODE RAY TUBE (CRT)
 23 ANTITRUST LITIGATION

24 Mater Case No.: 3:07-cv-05944-SC
 25 MDL No. 1917
 26 Individual Case Nos.
 27 3:11-cv-05513-SC;
 28 3:13-cv-05264-SC

29 This document relates to:

30 *Best Buy Co., Inc., et al. v. Hitachi, Ltd., et al.,*
 31 *No. 11-cv-05513-SC*

32 *Best Buy Co., Inc., et al. v. Technicolor SA, et*
 33 *al., No. 13-cv-05264-SC*

34 *Target Corp. v. Chunghwa Pictures Tubes,*
 35 *Ltd., et al., No. 3:07-cv-05514-SC*

36 *Target Corp. v. Technicolor SA, et al., Case*
 37 *No. 3:11-cv-05514-SC*

38 *Alfred H. Siegel, as Trustee of the Circuit City*
 39 *Stores, Inc. Liquidating Trust v. Hitachi, Ltd.,*
 40 *et al., No. 11-cv-05502-SC*

41 *Sears, Roebuck and Co., et. al. v. Chunghwa*
 42 *Picture Tubes, Ltd., et al., No. 11-cv-5514*

43 **DECLARATION OF JILL S.**
CASSELMAN IN SUPPORT OF
PLAINTIFFS' OPPOSITION TO
DEFENDANTS' MOTION IN LIMINE
NO. 2

44 Judge: Hon. Samuel Conti

1 *Sharp Electronics Corporation, et al. v.*
 2 *Hitachi, Ltd., et al., No. 13-cv-01173-SC*

3 *Sharp Electronics Corp., et al. v. Koninklijke*
 4 *Philips Electronics N.V., et al., No. 13-cv-2776*
 SC

5 *ViewSonic Corporation v. Chunghwa Picture*
 6 *Tubes, Ltd., et al., No. 14-cv-02510*

7 I, JILL S. CASSELMAN, declare as follows:

8 1. I am an attorney with the law firm of Robins Kaplan LLP, counsel for Plaintiffs
 9 Best Buy Co., Inc., Best Buy Purchasing LLC, Best Buy Enterprise Services, Inc., Best Buy
 10 Stores, L.P., and Bestbuy.com, L.L.C. (collectively “Best Buy”) in the above-captioned action
 11 currently pending in the U.S. District Court for the Northern District of California. I submit this
 12 declaration in support of Plaintiffs’ Opposition to Defendants’ Motion *in Limine* No. 2 to Exclude
 13 Evidence or Testimony Regarding Foreign Antitrust Investigations. I have personal knowledge
 14 of the facts stated herein, and I could and would competently testify thereto if called as a witness.

15 2. Attached hereto as **Exhibit 1** is a true and correct copy of the Korean Fair Trade
 16 Commission Press Release entitled “KFTC Fines 5 Color Display Tube Produces 26.2 Billion
 17 Won for CDT International Cartel”, dated January 27, 2011, which is publicly available and can
 18 be accessed online at http://eng.ftc.go.kr/bbs.do?command=getList&type_cd=52&pageId=0201.

19 3. Attached hereto as **Exhibit 2** is a true and correct copy of excerpts from
 20 Provisional European Commission Decision in case AT.39437—TV and Monitor Computer
 21 Tubes, which is publicly available and can be accessed in its entirety online at
http://ec.europa.eu/competition/elojade/isef/case_details.cfm?proc_code=1_39437.

22 4. Attached hereto as **Exhibit 3** is a true and correct copy of the “Decision of the
 23 President of the European Commission of (13 October 2011) on the function and terms of
 24 reference of the hearing officer in certain competition proceedings” [2011] OJ L 275, which is
 25 publicly available and can be accessed online at
http://ec.europa.eu/competition/hearing_officers/legislation.html.

5. Attached hereto as **Exhibit 4** is a true and correct copy of the “Commission notice on best practices for the conduct of proceedings concerning Articles 101 and 102 TFEU”, which is publicly available and can be accessed online at <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52011XC1020%2802%29>.

6. Attached hereto as **Exhibit 5** are true and correct copies of the DPPs' Second Set of RFPs Nos. 34-36 (Mar. 12, 2010), and the following objections and responses to the same:
Objections & Resps. of Panasonic Corp. to DPPs' Second Set of RFPs Nos. 34-36, May 12, 2010;
Def. Hitachi, Ltd's Resp. to Second Set of RFPs from DPPs Nos. 34-36, May 12, 2010;
Objections & Resps. of Def. MT Picture Display Co., Ltd. to DPPs' Second Set of RFPs Nos. 34-36, May 12, 2010.

I declare under penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct to the best of my knowledge.

Executed this 13th day of March, 2015 in Los Angeles, California.

/s/ Jill S. Casselman

Jill S. Casselman